

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

JUDY JACK	§	Case No. 07-32747-H4-13
Debtor	§	
	§	Chapter 13
AMC MORTGAGE SERVICE, INC.	§	
Movant	§	
vs.	§	
JUDY JACK	§	
Respondent	§	

**DEBTOR'S RESPONSE AND OBJECTION TO THE MOTION FOR
RELIEF FROM AUTOMATIC STAY AND
REQUEST FOR HEARING(Docket #9)**

Judy Jack (individually “Debtors”), respond and objects to the Motion for Relief from the Automatic Stay(Docket #9) (“Motion”) filed by AMC Mortgage Service, Inc. (“Movant”) with regard to the collateral or property described by Movant in the Motion (the “Property”) and will show the court as follows:

General Response:

_____ Movant failed to utilize the proper form of motion. The motion should be denied.

Specific Responses

1. Debtor admits the allegations contained in paragraph: 1.
2. Debtor admits the allegations contained in paragraph: 2.
3. Debtor has insufficient information as to the owner and holder of the Note and therefore denies the allegations in paragraph: 3.
4. Debtor has insufficient information as to the sale of the Debtor’s property and therefore denies the allegations contained in paragraph: 4.

5. Debtor denies the allegations contained in paragraph : 5.
6. There is not a paragraph 6.
7. Debtor denies the allegations contained in paragraph: 7.
8. Debtor denies the allegations contained in last paragraph.
9. The Property is necessary for a successful reorganization of the Debtor.
10. Debtor requests a hearing on the Motion.

WHEREFORE, Debtor respectfully request the court conduct a hearing on the Motion and after the hearing deny the Motion and grant them such other and further relief to which they are entitled.

Dated: May 15, 2007

Respectfully submitted,

/s/ Reese W. Baker
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OF COUNSEL:

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CERTIFICATE OF SERVICE

A copy of the Debtor's Response and Objection to Movant's Motion for Relief from the Automatic Stay was delivered on or about May 15, 2007, to all parties listed below in the manner listed below:

Kerry M. Southerland
3333 Lee Parkway, Eighth Floor
Dallas, TX 75219
Attorney for Movant

CM/ECF Electronic Delivery

David G. Peake
9660 Hillcroft, #430
Houston, TX 77096

CM/ECF Electronic Delivery

/s/ Reese W. Baker
Reese W. Baker

VERIFICATION OF TRANSMITTAL TO U.S. TRUSTEE

The undersigned attorney, under penalty of perjury, hereby certifies that a copy of Debtor's Response and Objection to Movant's Motion for Relief from the Automatic Stay was delivered to the United States Trustee, 515 Rusk, Suite 3516, Houston, Texas, 77002, on or about May 15, 2007, by CM/ECF electronic delivery.

/s/ Reese W. Baker
Reese W. Baker